

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
3:20-cv-00504-FDW-DSC

CPI SECURITY SYSTEMS, INC.,

Plaintiff,

Vs.

VIVENT SMART HOME, INC. f/k/a  
MOSAIC ACQUISITION CORP.; LEGACY  
VIVENT SMART HOME, INC. f/k/a  
VIVENT SMART HOME, INC.,

Defendants.

/

ZOOM VIDEO/TELEPHONIC DEPOSITION OF ALLINE F. MAXWELL

August 30, 2021

11:52 a.m.

\* \* \*

Taken By the Defendants  
remotely By  
Zoom Video Conferencing

Reported By:

Taura J. Vulcano, CSR, RPR

1           A. (Unintelligible) it was -- it was normal  
2 circumstances, I would have thought that. Other  
3 than normal situations, I don't know.

4           Q. Okay. And Alline, why did you switch  
5 from CPI to Vivent? What were the actual reasons  
6 you switched?

7           A. It was because -- the main reason was  
8 the door, the front doorbell, okay? I never could  
9 get them to get it right.

10          Q. Uh-huh.

11          A. And then another -- the other thing was  
12 the -- the racial thing that the man said about  
13 black people --

14          Q. Alline --

15          A. -- on TV. I didn't hear it, but my  
16 neighbors did.

17          Q. Okay. And, Alline, why were you upset  
18 about the racial comments made about black people  
19 by CPI's CEO?

20          A. I mean, this -- I know this type of  
21 thing goes on all the time. I'm not crazy and I'm  
22 not stupid. I'm 79 years old, and I've been  
23 through some of that shit. And anyway, because  
24 what he said was not true. Because we -- a lot of  
25 black people got education more so than some white

1 people have.

2 Q. Uh-huh.

3 A. That's the reason I got upset.

4 Q. I see --

5 A. Because they all throwing it out there.

6 Q. Okay. And my last question for now,

7 Alline, did you like the Vivent system and  
8 customer service more than CPI's equipment and  
9 customer service?

10 A. I never spoke to Vivent about anything  
11 like that --

12 Q. Okay. So did you --

13 A. -- anything about their material,  
14 anything about their equipment.

15 Q. Okay. So you never had issues with  
16 Vivent's equipment; is that what you're saying?

17 A. Yes.

18 Q. Okay. But did you like the Vivent  
19 equipment better than the CPI equipment?

20 A. Yes, I do -- yes, I did.

21 Q. Okay. Great. Thanks, Alline. Those  
22 are all of my questions for now.

23 A. All right.

24 RE-EXAMINATION BY MR. HOBBS

25 Q. Mrs. Maxwell, I just have a couple